

The Honorable Franklin D. Burgess

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CARLOS MARTINEZ JIMENEZ ,

Petitioner,

v.

MARIA GUADALUPE LOZA LOZANO,

Respondent.

CASE No. C05-5736 FDB

**STIPULATION AND ORDER RE: CASE
SCHEDULE AND CONTINUANCE OF
HEARING DATE**

Petitioner Carlos Martinez Jimenez and Respondent Maria Guadalupe Loza Lozano,
through counsel, hereby stipulates as follows:

(1) Petitioner's and Respondent's trial brief to the Court is due on August 24, 2006;

(2) The July 6, 2006 hearing on Petitioner's Amended Petition for Return of Child
(the "Petition for Return") (dkt. #5) is hereby continued to August 31, 2006 at 9:00 AM;

(3) Mrs. Maria Guadalupe Loza Lozano shall appear, together with RLJ, at the
hearing on the Petition on August 31, 2006 at 9:00 AM;

(4) Mrs. Maria Guadalupe Loza Lozano is prohibited from removing RLJ from the
jurisdiction of this Court pending hearing on the Petition for Return;

(5) The previous Case Schedule for the above referenced matter is hereby stricken
and no longer applicable.

STIPULATION AND [PROPOSED] ORDER RE
CASE SCHEDULE AND CONTINUANCE OF
HEARING DATE - 1
CASE NO. C05-5736 FDB

DLA Piper Rudnick Gray Cary US LLP
701 Fifth Avenue, Suite 7000
Seattle, WA 98104-7044 ! Tel: 206.839.4800

1 The purpose of this stipulation is to facilitate preparation for the hearing on the Petition
2 for Return. This stipulation allows petitioner time to continue to attempt to secure a visa for the
3 hearing while also allowing respondent time to respond to the Petition for Return.

4
5 STIPULATED TO this 23rd day of June, 2006

6
7 **DLA PIPER RUDNICK GRAY CARY US LLP**

8 s/ Christopher Huck

9 *Christopher Huck, WSBA No. 34104
10 Kit Roth, WSBA No. 33059
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14
15 **JAMES H. BOLDT**

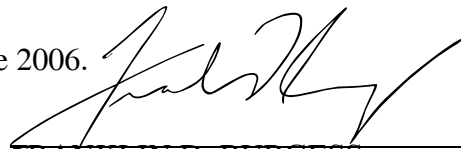
16 s/ James H. Boldt (E-Mail Authorization on 6/22/06)

17 James H. Boldt, WSBA No. 32225

18 Attorneys for Respondent
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20 Shelton, WA 98584
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21 **IT IS SO ORDERED.**

22
23 DATED this 28th day of June 2006.

24 

25 **FRANKLIN D. BURGESS**
26 **UNITED STATES DISTRICT JUDGE**

CERTIFICATE OF SERVICE

I, Christopher Huck, certify that on the 23rd day of June, 2006, I caused to be served
copies of:

(1) Stipulation and [PROPOSED] Order re: Case Schedule and Continuance of
Hearing Date; and

(2) this Certificate of Service

to the following:

James H. Boldt, WSBA No. 32225
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Attorneys for Respondent

☐ Via Hand Delivery
☐ Via U.S. Mail
☐ Via Facsimile
☒ Via ECF

I certify under penalty of perjury under the laws of the State of Washington that the
foregoing is true and correct.

Executed at Seattle, Washington this 23rd day of June, 2006.

s/Christopher Huck

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